

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

IN RE: Grant Loveless) Case No. 13-10127 NLJ
) Chapter 12
Debtor.)

**DEBTOR'S COMBINED MOTION TO SELL REAL ESTATE
AND NOTICE OF DEADLINE FOR FILING OBJECTIONS**

COMES NOW Debtor, Grant Loveless, by and through his attorney of record, Joey D. Schmidt of Central Law Office, P.C., and presents to this Court the following facts:

Debtor hereby states that on January 15, 2013, he filed his Chapter 12 bankruptcy petition. Subsequently the Chapter 12 Plan was confirmed on July 2, 2013.

Debtor seeks permission of the Court to sell a tract land in Grady county described herein as:

The SE/4 of NW/4 of Section 4-6N-8 West of the Indian Meridian, Grady County, Oklahoma. 34.7 Acres MOL. Surface Rights Only.

Debtor represents that the purchase price is \$55,520.00 as set forth in the "Real Estate Contract." See attached Contract.

Debtor requests the Court's permission to sell the property for the purchase price. Further, the Debtor requests that the proceeds of the sale, namely \$55,520.00 less cost of sale as approved by this court, be remitted to the Trustee for payments as described in the confirmed plan to Chickasha Bank & Trust (estimated \$54,560 net cost of sale). After payment of Trustee fees estimated to be \$6,062.22, the balance of shall be paid on delinquent amount due to Chickasha Bank & Trust estimated at \$9,005.88, the remainder shall be applied to the future payments due to Chickasha Bank & Trust (approximately \$39,491.91).

That the proposed purchaser of the property is Justin Moody.

That the Debtor believes that a mortgage exists on the property in the name Chickasha Bank & Trust. Debtor seeks the Court's authority to sell the property pursuant to the authority of 11 U.S.C. §1206 and subject to the special tax provisions of 11 U.S.C. §1222 (a)(2)(A).

Debtor proposes to close such sales any time after the Court enters its order granting this Motion subsequent to the 21 day period to object and to turn over the proceeds of the sale, less any costs of sale, including title examination fees, attorney fees, abstracting costs and any other costs, the remainder to be turned over to the Chickasha Bank & Trust to make the Plan payment and reduce the debt.

NOTICE OF OPPORTUNITY FOR HEARING:

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must

file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served) and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

OBJECTIONS MUST BE FILED WITHIN TWENTY-ONE DAYS OF FILING. Objections due on or before JANUARY 20, 2015.

WHEREFORE, Debtor respectfully requests that this Court allow him to sell the property.

/s/ Joey D. Schmidt

Joey D. Schmidt, OBA #11507
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ATTORNEY FOR DEBTORS

Approved by:

/s/ Grant Loveless 12/30/2014

Grant Loveless

CERTIFICATE OF SERVICE

I, Joey D. Schmidt, declare under penalty of perjury, the "Motion to Sell", was filed electronically and the following parties received the document through the Electronic Filing System:

Lonnie Eck, Chapter 12 Trustee
 Deborah A. Moon on behalf of Attorney Chickasha Bank & Trust Co.
 U.S. Trustee

This is to certify that a true copy of the "**DEBTORS' MOTION TO SELL**", was sent first class postage paid mail to the following:

ACS Student Loan Attn: Collections Department PO Box 7051 Utica, NY 13504-7051	Long Beach, CA 90801-5724	Internal Revenue Service 55 N Robinson MS 5024 OKC Oklahoma City OK 73102
AGCO Finance LLC PO Box 2000 Johnston IA 50131-0020	Deborah K. Loveless PO Box 285 Chickasha OK 73023-0285	JPMorgan Chase Bank NA c/o Kivell, Rayment & Francis, PC Attn: Amy Collins or Michael George 7666 E. 61st Street, Ste 550 Tulsa, OK 74133-1199
Apache Farmers Cooperative c/o Seth A. Day Hall, Estill, Hardwick, Gable, Golden & Nelson PC 100 N Broadway, Ste 2900 Oklahoma City OK 73102	Farm Service Agency PO Box 710 Chickasha, OK 73023-0710	Oklahoma Tax Commission 120 N Robinson Ave Ste 2000 Oklahoma City OK 73102-7471
Capital One Bank (USA), N.A. By American InfoSource LP as Agent PO Box 71083 Charlotte, NC 28272-1083	Farm Service Agency Oklahoma State Office 100 USDA Ste 102 Stillwater, OK 74074	Sallie Mae Student Loan PO Box 9500 Wilkes Barre, PA 18773-9500
College Loan Corporation c/o Xerox PO Box 22724	Grant Loveless 285 County Rd 1370 Chickasha OK 73018-8043	USDA, Farm Service Agency Attn: Melissa Cook PO Box 219 Pryor, OK 74362-0219
	Internal Revenue Service Chapter 12 Corresp PO Box 7346 Philadelphia, PA 19101-7346	

/s/ Joey D. Schmidt
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